

<b>TO: Mail Stop 8</b> <b>Director of the U.S. Patent &amp; Trademark Office</b> <b>P.O. Box 1450</b> <b>Alexandria, VA 22313-1450</b>	<b>REPORT ON THE</b> <b>FILING OR DETERMINATION OF AN</b> <b>ACTION REGARDING A PATENT OR</b> <b>TRADEMARK</b>
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In Compliance with 35 § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been filed in the U.S. District Court \_\_\_\_\_ on the following    ☒ Patents or    ☐ Trademarks:

DOCKET NO. <b>CV 10-05447 BZ</b>	DATE FILED <b>12/1/2010</b>	U.S. DISTRICT COURT <b>Northern District of California, San Francisco</b>
PLAINTIFF <b>RAMBUS INC</b>		DEFENDANT <b>MEDIATEK INC</b>
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1    See Complaint		
2    6 Pat.		
3		
4		
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In the above—entitled case, the following patent(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading		
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK	
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In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT
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CLERK  <b>Richard W. Wieking</b>	(BY) DEPUTY CLERK  <b>Mark J. Jenkins</b>	DATE  <b>December 2, 2010</b>
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1 using, offering to sell, selling (directly or through intermediaries), and/or importing Accused  
2 Products consisting of or including SDR, DDR-type, and/or GDDR-type memory controllers, and  
3 mobile and/or low power versions thereof, in this district and elsewhere in the United States, and/or  
4 (2) has contributed to the literal infringement and/or infringement under the doctrine of equivalents  
5 of claims of the '195 Patent, and/or has actively induced others to infringe claims of the '195 Patent,  
6 literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

### 7 COUNT III

#### 8 **(Patent Infringement of U.S. Patent No. 6,260,097 Under 35 U.S.C. § 271, et. seq.)**

9 45. Rambus incorporates by reference and realleges paragraphs 1 through 44 above as  
10 though fully restated herein.

11 46. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has  
12 infringed claims of the '097 Patent, literally and/or under the doctrine of equivalents, by making,  
13 using, offering to sell, selling (directly or through intermediaries), and/or importing Accused  
14 Products consisting of or including DDR-type and/or GDDR-type memory controllers, and mobile  
15 and/or low power versions thereof, in this district and elsewhere in the United States, and/or (2) has  
16 contributed to the literal infringement and/or infringement under the doctrine of equivalents of  
17 claims of the '097 Patent, and/or has actively induced others to infringe claims of the '097 Patent,  
18 literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

### 19 COUNT IV

#### 20 **(Patent Infringement of U.S. Patent No. 6,304,937 Under 35 U.S.C. § 271, et. seq.)**

21 47. Rambus incorporates by reference and realleges paragraphs 1 through 46 above as  
22 though fully restated herein.

23 48. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has  
24 infringed claims of the '937 Patent, literally and/or under the doctrine of equivalents, by making,  
25 using, offering to sell, selling (directly or through intermediaries), and/or importing Accused  
26 Products consisting of or including DDR-type and/or GDDR-type memory controllers, and mobile  
27 and/or low power versions thereof, in this district and elsewhere in the United States, and/or (2) has  
28

1 contributed to the literal infringement and/or infringement under the doctrine of equivalents of  
2 claims of the '937 Patent, and/or has actively induced others to infringe claims of the '937 Patent,  
3 literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

#### 4 COUNT V

#### 5 (Patent Infringement of U.S. Patent No. 6,426,916 6 Under 35 U.S.C. § 271, *et. seq.*)

7 49. Rambus incorporates by reference and realleges paragraphs 1 through 48 above as  
8 though fully restated herein.

9 50. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has  
10 infringed claims of the '916 Patent, literally and/or under the doctrine of equivalents, by making,  
11 using, offering to sell, selling (directly or through intermediaries), and/or importing Accused  
12 Products consisting of or including SDR, DDR-type, and/or GDDR-type memory controllers, and  
13 mobile and/or low power versions thereof, in this district and elsewhere in the United States, and/or  
14 (2) has contributed to the literal infringement and/or infringement under the doctrine of equivalents  
15 of claims of the '916 Patent, and/or has actively induced others to infringe claims of the '916 Patent,  
16 literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

#### 17 COUNT VI

#### 18 (Patent Infringement of U.S. Patent No. 6,584,037 19 Under 35 U.S.C. § 271, *et. seq.*)

20 51. Rambus incorporates by reference and realleges paragraphs 1 through 50 above as  
21 though fully restated herein.

22 52. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has  
23 infringed claims of the '037 Patent, literally and/or under the doctrine of equivalents, by making,  
24 using, offering to sell, selling (directly or through intermediaries), and/or importing Accused  
25 Products consisting of or including DDR2 and/or GDDR3 memory controllers, and mobile and/or  
26 low power versions thereof, in this district and elsewhere in the United States, and/or (2) has  
27 contributed to the literal infringement and/or infringement under the doctrine of equivalents of  
28 claims of the '037 Patent, and/or has actively induced others to infringe claims of the '037 Patent,  
literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

**COUNT VII**

**(Patent Infringement of U.S. Patent No. 6,715,020  
Under 35 U.S.C. § 271, *et. seq.*)**

53. Rambus incorporates by reference and realleges paragraphs 1 through 52 above as though fully restated herein.

54. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has infringed claims of the '020 Patent, literally and/or under the doctrine of equivalents, by making, using, offering to sell, selling (directly or through intermediaries), and/or importing Accused Products consisting of or including SDR, DDR-type, and/or GDDR-type memory controllers, in this district and elsewhere in the United States, and/or (2) has contributed to the literal infringement and/or infringement under the doctrine of equivalents of claims of the '020 Patent, and/or has actively induced others to infringe claims of the '020 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

**COUNT VIII**

**(Patent Infringement of U.S. Patent No. 6,751,696  
Under 35 U.S.C. § 271, *et. seq.*)**

55. Rambus incorporates by reference and realleges paragraphs 1 through 54 above as though fully restated herein.

56. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has infringed and continues to infringe claims of the '696 Patent, literally and/or under the doctrine of equivalents, by making, using, offering to sell, selling (directly or through intermediaries), and/or importing Accused Products consisting of or including DDR-type and/or GDDR-type memory controllers, and mobile and/or low power versions thereof, in this district and elsewhere in the United States, and/or (2) has contributed and continues to contribute to the literal infringement and/or infringement under the doctrine of equivalents of claims of the '696 Patent, and/or has actively induced and continues to actively induce others to infringe claims of the '696 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

**COUNT IX**

**(Patent Infringement of U.S. Patent No. 7,209,997  
Under 35 U.S.C. § 271, *et. seq.*)**

57. Rambus incorporates by reference and realleges paragraphs 1 through 56 above as though fully restated herein.

58. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has infringed and continues to infringe claims of the '997 Patent, literally and/or under the doctrine of equivalents, by making, using, offering to sell, selling (directly or through intermediaries), and/or importing Accused Products consisting of or including SDR, DDR-type, and/or GDDR-type memory controllers, and mobile and/or low power versions thereof, in this district and elsewhere in the United States; and/or (2) has contributed and continues to contribute to the literal infringement and/or infringement under the doctrine of equivalents of claims of the '997 Patent, and/or has actively induced and continues to actively induce others to infringe claims of the '997 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

**COUNT X**

**(Patent Infringement of U.S. Patent No. 6,591,353  
Under 35 U.S.C. § 271, *et. seq.*)**

59. Rambus incorporates by reference and realleges paragraphs 1 through 58 above as though fully restated herein.

60. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has infringed and continues to infringe claims of the '353 Patent, literally and/or under the doctrine of equivalents, by making, using, offering to sell, selling (directly or through intermediaries), and/or importing Accused Products consisting of or including DDR-type and/or GDDR-type memory controllers, and mobile and/or low power versions thereof, in this district and elsewhere in the United States, and/or (2) has contributed and continues to contribute to the literal infringement and/or infringement under the doctrine of equivalents of claims of the '353 Patent, and/or has actively induced and continues to actively induce others to infringe claims of the '353 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

**COUNT XI**

**(Patent Infringement of U.S. Patent No. 7,287,109  
Under 35 U.S.C. § 271, *et. seq.*)**

61. Rambus incorporates by reference and realleges paragraphs 1 through 60 above as though fully restated herein.

62. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has infringed and continues to infringe claims of the '109 Patent, literally and/or under the doctrine of equivalents, by making, using, offering to sell, selling (directly or through intermediaries), and/or importing Accused Products consisting of or including DDR-type and/or GDDR-type memory controllers, and mobile and/or low power versions thereof, in this district and elsewhere in the United States, and/or (2) has contributed and continues to contribute to the literal infringement and/or infringement under the doctrine of equivalents of claims of the '109 Patent, and/or has actively induced and continues to actively induce others to infringe claims of the '109 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

**VI.**

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Rambus asks this Court to enter judgment in its favor against MediaTek and grant the following relief:

- A. An adjudication that MediaTek has infringed and continues to infringe the Asserted Patents as alleged above;
- B. An accounting of all damages sustained by Rambus as a result of MediaTek's acts of infringement of the Asserted Patents;
- C. An award to Rambus of actual damages adequate to compensate Rambus for MediaTek's acts of patent infringement, together with prejudgment and postjudgment interest;
- D. An award to Rambus of enhanced damages, up to and including trebling of Rambus's damages pursuant to 35 U.S.C. § 284 for MediaTek's willful infringement of the Asserted Patents;

1 E. An award of Rambus's costs of suit and reasonable attorneys' fees pursuant to 35  
2 U.S.C. § 285 due to the exceptional nature of this case, or as otherwise permitted by law;

3 F. A grant of a permanent injunction pursuant to 35 U.S.C. § 283, enjoining  
4 MediaTek, and each of its agents, servants, employees, principals, officers, attorneys, successors,  
5 assignees, and all those in active concert or participation with MediaTek, including related  
6 individuals and entities, customers, representatives, OEMs, dealers, and distributors from further acts  
7 of (1) infringement, (2) contributory infringement, and (3) active inducement to infringe with respect  
8 to the claims of the Asserted Patents;

9 G. Any further relief that this Court deems just and proper.

10 VII.

11 **JURY DEMAND**

12 Plaintiff Rambus requests a jury trial on all issues triable to a jury in this matter.

13  
14 Respectfully Submitted,

15 DATED: December 1, 2010

MUNGER, TOLLES & OLSON LLP

16  
17 By:   
18 PETER A. DETRE

19 Attorneys for Plaintiff  
20 RAMBUS INC.  
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Attorneys for Plaintiff  
RAMBUS INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RAMBUS INC.,

Plaintiff,

v.

MEDIATEK INC.,

Defendant.

ORIGINAL  
FILED  
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RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

E-filing

BZ

10 5447  
CASE NO.

COMPLAINT FOR PATENT  
INFRINGEMENT

DEMAND FOR JURY TRIAL



1 Plaintiff Rambus Inc. ("Rambus") states the following as its Complaint against Defendant  
2 MediaTek Inc. ("MediaTek"):

3 I.

4 **THE PARTIES**

5 1. Plaintiff Rambus is a Delaware corporation with its principal place of business at  
6 1050 Enterprise Way, Sunnyvale, California 94089.

7 2. Rambus is informed and believes, and thereupon alleges, that defendant MediaTek is  
8 a Taiwan corporation with its principal place of business at No. 1, Dusing Road 1, Hsinchu Science  
9 Park, Hsin-Chu, Taiwan 30078, R.O.C. Upon information and belief, MediaTek has substantial  
10 contacts and transacts substantial business, either directly or through its agent, on an ongoing basis  
11 in this judicial district and elsewhere in the United States.

12 3. Unless specifically stated otherwise, the acts complained of herein were committed  
13 by, on behalf of, and/or for the benefit of MediaTek.

14 II.

15 **NATURE OF THE ACTION**

16 4. This is an action for patent infringement.

17 5. Rambus is informed and believes, and thereupon alleges, that MediaTek has been  
18 and/or is infringing, contributing to the infringement of, and/or actively inducing others to infringe  
19 claims of U.S. Patent No. 6,034,918 (the "'918 Patent"), U.S. Patent No. 6,038,195 (the "'195  
20 Patent"), U.S. Patent No. 6,260,097 (the "'097 Patent"), U.S. Patent No. 6,304,937 (the "'937  
21 Patent"), U.S. Patent No. 6,426,916 (the "'916 Patent"), U.S. Patent No. 6,584,037 (the "'037  
22 Patent"), U.S. Patent No. 6,591,353 (the "'353 Patent"), U.S. Patent No. 6,715,020 (the "'020  
23 Patent"), U.S. Patent No. 6,751,696 (the "'696 Patent"), U.S. Patent No. 7,209,997 (the "'997  
24 Patent"), and U.S. Patent No. 7,287,109 (the "'109 Patent") (collectively the "Asserted Patents").  
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III.

**JURISDICTION AND VENUE**

6. This action arises under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. This Court has personal jurisdiction over MediaTek because MediaTek has substantial contacts and conducts business in the State of California and in this judicial district, and has been infringing, contributing to the infringement of and/or actively inducing others to infringe claims of the Asserted Patents in California and elsewhere.

8. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b), 1391(c), 1391(d) and/or 1400(b) because a substantial part of the events giving rise to Rambus's claims occurred in the Northern District of California and because MediaTek is subject to personal jurisdiction in the Northern District of California.

IV.

**FACTUAL BACKGROUND**

**A. Rambus**

9. Rambus is one of the world's leading designers of semiconductor interface technologies that are used in a broad range of consumer, computing, and communications applications. In addition to the development of high-speed interfaces, Rambus's breakthrough technology and unparalleled engineering expertise have solved the most challenging interface problems and have brought industry-leading products to market. Rambus's interface solutions have enabled state-of-the-art performance in many products, such as personal computers, workstations, servers, gaming consoles, televisions, Blu-ray players, set-top boxes, printers, video projectors, network switches, modems, routers, mobile phones, and graphics cards.

10. In the late 1980s, Michael Farmwald and Mark Horowitz, the founders of Rambus, recognized and set out to solve the "memory bottleneck problem," the failure of memory interfaces to keep pace with the exponential growth in microprocessor speed. Farmwald and Horowitz's inventions enabled a dynamic random access memory (DRAM) memory architecture that achieved

1 data transmission rates of 500 megahertz, at a time when other DRAM chips were running in the  
2 range of 20-30 megahertz.

3 11. Since its founding in 1990, Rambus has continued to design, develop, market, and  
4 license its high speed interface technology. Rambus's inventions include new memory devices, new  
5 controllers for controlling such memory devices, and new systems incorporating those memory  
6 devices and memory controllers. Rambus's inventions also include new transmitters and receivers  
7 and interface technology.

8 12. Rambus has made large-scale investments in the exploitation of its technology and a  
9 large number of companies have paid for licenses to its patents. Rambus has granted licenses of  
10 varying scope to its technology to many of the world's largest semiconductor manufacturers.

11 13. Since 1990, Rambus has spent millions of dollars on research and development of its  
12 valuable technology. Rambus relies on the United States patent system to protect the technology  
13 resulting from its research and development. Rambus's continued success depends on its research  
14 and development of memory interface and other solutions, as well as the protection of intellectual  
15 property in its innovative technology.

16 **B. Asserted Patents**

17 14. On April 18, 1990, U.S. Patent Application No. 07/510,898 was filed naming Michael  
18 Farmwald and Mark Horowitz as inventors. The Asserted Patents claiming priority to this  
19 application are referred to herein as the "Farmwald/Horowitz Patents."

20 15. On October 19, 1995, U.S. Patent Application No. 08/545,292 was filed naming  
21 Richard M. Barth and other individuals as inventors. The Asserted Patents claiming priority to this  
22 application are referred to herein as the "Barth Patents."

23 **1. Farmwald/Horowitz Patents**

24 16. On March 7, 2000, U.S. Patent No. 6,034,918, titled "Method of Operating a Memory  
25 Having a Variable Data Output Length and a Programmable Register," was duly and legally issued  
26 to Rambus, as assignee of named inventors Michael Farmwald and Mark Horowitz.

1           17.     On March 14, 2000, U.S. Patent No. 6,038,195, titled "Synchronous Memory Device  
2 Having a Delay Time Register and Method of Operating Same," was duly and legally issued to  
3 Rambus, as assignee of named inventors Michael Farmwald and Mark Horowitz.

4           18.     On July 10, 2001, U.S. Patent No. 6,260,097, titled "Method and Apparatus for  
5 Controlling a Synchronous Memory Device," was duly and legally issued to Rambus, as assignee of  
6 named inventors Michael Farmwald and Mark Horowitz.

7           19.     On October 16, 2001, U.S. Patent No. 6,304,937, titled "Method of Operation of a  
8 Memory Controller," was duly and legally issued to Rambus, as assignee of named inventors  
9 Michael Farmwald and Mark Horowitz.

10          20.     On July 30, 2002, U.S. Patent No. 6,426,916, titled "Memory Device Having a  
11 Variable Data Output Length and a Programmable Register," was duly and legally issued to  
12 Rambus, as assignee of named inventors Michael Farmwald and Mark Horowitz.

13          21.     On June 24, 2003, U.S. Patent No. 6,584,037, titled "Memory Device Which Samples  
14 Data After an Amount of Time Expires," was duly and legally issued to Rambus, as assignee of  
15 named inventors Michael Farmwald and Mark Horowitz.

16          22.     On March 30, 2004, U.S. Patent No. 6,715,020, titled "Synchronous Integrated  
17 Circuit Device," was duly and legally issued to Rambus, as assignee of named inventors Michael  
18 Farmwald and Mark Horowitz.

19          23.     On June 15, 2004, U.S. Patent No. 6,751,696, titled "Memory Device Having a  
20 Programmable Register," was duly and legally issued to Rambus, as assignee of named inventors  
21 Michael Farmwald and Mark Horowitz.

22          24.     On April 24, 2007, U.S. Patent No. 7,209,997, titled "Controller Device and Method  
23 for Operating Same," was duly and legally issued to Rambus, as assignee of named inventors  
24 Michael Farmwald and Mark Horowitz.

25          25.     The Farmwald/Horowitz Patents include claims directed to improving the  
26 performance of memory controllers.

27          26.     At all relevant times, Rambus has been the owner of the entire right, title, and interest  
28 in each of the Farmwald/Horowitz Patents.

1                                2.     **Barth Patents**

2                27.     On July 8, 2003, U.S. Patent No. 6,591,353, titled "Protocol for Communication with  
3 Dynamic Memory," was duly and legally issued to Rambus, as assignee of Richard M. Barth and the  
4 other inventors named therein.

5                28.     On October 23, 2007, U.S. Patent No. 7,287,109, titled "Method of Controlling a  
6 Memory Device Having a Memory Core," was duly and legally issued to Rambus, as assignee of  
7 Richard M. Barth and the other inventors named therein.

8                29.     The Barth Patents include claims directed to improving the performance of memory  
9 controllers.

10              30.     At all relevant times, Rambus has been the owner of the entire right, title, and interest  
11 in each of the Barth Patents.

12                                C.     **MediaTek's Acts of Infringement**

13              31.     Rambus is informed and believes, and thereupon alleges, that MediaTek has made,  
14 used, sold, imported and/or offered for sale, and/or continued to make, use, sell, import and/or offer  
15 for sale, products in the United States consisting of or including DRAM memory controllers,  
16 including SDR (Single Data Rate) memory controllers, DDR-type memory controllers (including  
17 DDR or Double Data Rate memory controllers, and DDR2 or Double Data Rate 2 memory  
18 controllers), GDDR-type memory controllers (including GDDR3 or Graphic Double Data Rate 3  
19 memory controllers), and mobile and/or low power versions of the aforementioned memory  
20 controllers.

21              32.     The aforementioned MediaTek products are hereinafter referred to collectively as the  
22 "Accused Products." The Accused Products include at least products that are part of, for example,  
23 MediaTek's Digital Consumer DVD, DTV, and PC Optical Storage Drive product lines.

24              33.     MediaTek's making, use, sale, offers for sale, and/or importation of the Accused  
25 Products in the United States constitute acts of direct infringement of the Asserted Patents.

26              34.     In November 2005, Rambus contacted MediaTek to discuss licensing of Rambus  
27 patents. On or about December 15, 2005, Rambus provided information to MediaTek regarding the  
28

1 infringement of the '918 Patent, the '195 Patent, the '097 Patent, the '937 Patent, the '916 Patent, the  
2 '020 Patent, and the '696 Patent by MediaTek products.

3 35. Rambus is informed and believes, and thereupon alleges, that MediaTek's knowing  
4 infringement has continued despite further information regarding infringement provided by Rambus  
5 in the course of attempting to negotiate a license with MediaTek that would fairly compensate  
6 Rambus for MediaTek's use of patents owned by Rambus. For example, on or about March 27,  
7 2006, Rambus provided further information to MediaTek regarding the infringement of the '918  
8 Patent, the '195 Patent, the '097 Patent, the '937 Patent, the '916 Patent, the '020 Patent, and the  
9 '696 Patent by MediaTek products.

10 36. Rambus is informed and believes, and thereupon alleges, that MediaTek has sold or  
11 offered to sell its Accused Products to third parties who incorporate the Accused Products into their  
12 own products. Those third parties in turn have made, used, sold, offered for sale, and/or imported  
13 and/or continue to make, use, sell, offer for sale, and/or import their own products in the United  
14 States. These activities undertaken by the third parties constitute acts of direct infringement of the  
15 Asserted Patents. The memory controllers in MediaTek's Accused Products are known by  
16 MediaTek to be especially made or especially adapted for use in infringement of the Asserted  
17 Patents and are not staple articles or commodities of commerce suitable for substantial non-  
18 infringing use. MediaTek has thereby contributed to and continues to contribute to the infringement  
19 of the Asserted Patents.

20 37. Rambus is informed and believes, and thereupon alleges, that, by its sales and/or  
21 offers for sale of the Accused Products to third parties, MediaTek also has induced and continues to  
22 induce acts by third parties that MediaTek knew or should have known would constitute direct  
23 infringement of the Asserted Patents. MediaTek actively induces infringement of the Asserted  
24 Patents by designing the Accused Products to be capable of infringement and by promoting and  
25 encouraging the use of its products by the third parties in ways that infringe the Asserted Patents.

26 38. Rambus is entitled to recover from MediaTek the actual damages it sustained as a  
27 result of MediaTek's wrongful acts alleged herein under 35 U.S.C. § 284 in an amount to be proven  
28 at trial, together with interest and costs.

39. Rambus is informed and believes, and thereupon alleges, that MediaTek's infringement of the Asserted Patents as set forth herein has been and is willful, deliberate and in disregard of the patent rights of Rambus, and Rambus is therefore entitled to increased damages up to three times the amount of actual damages and attorneys' fees, pursuant to 35 U.S.C. §§ 284, 285.

40. MediaTek's infringement of the Asserted Patents will continue to damage Rambus, causing irreparable harm for which there is no adequate remedy at law, unless it is enjoined by this Court.

V.

**CLAIMS FOR RELIEF**

**COUNT I**

**(Patent Infringement of U.S. Patent No. 6,034,918  
Under 35 U.S.C. § 271, *et seq.*)**

41. Rambus incorporates by reference and realleges paragraphs 1 through 40 above as though fully restated herein.

42. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has infringed claims of the '918 Patent, literally and/or under the doctrine of equivalents, by making, using, offering to sell, selling (directly or through intermediaries), and/or importing Accused Products consisting of or including SDR, DDR-type, and/or GDDR-type memory controllers, and mobile and/or low power versions thereof, in this district and elsewhere in the United States, and/or (2) has contributed to the literal infringement and/or infringement under the doctrine of equivalents of claims of the '918 Patent, and/or has actively induced others to infringe claims of the '918 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

**COUNT II**

**(Patent Infringement of U.S. Patent No. 6,038,195  
Under 35 U.S.C. § 271, *et seq.*)**

43. Rambus incorporates by reference and realleges paragraphs 1 through 42 above as though fully restated herein.

44. Rambus is informed and believes, and thereupon alleges, that MediaTek: (1) has infringed claims of the '195 Patent, literally and/or under the doctrine of equivalents, by making,